Noah Horst, OSB No. 076089 Email: noah@lmhlegal.com Ethan Levi, OSB No. 994255 Email: ethan@lmhlegal.com

Norah Van Dusen, OSB No. 180114

Email: norah@lmhlegal.com Levi Merrithew Horst PC 610 SW Alder Street, Suite 415 Portland, Oregon 97205

Telephone: (971) 229-1241 Facsimile: (971) 544-7092

**Attorneys for Defendant** 

## UNITED STATES DISTRICT COURT

## DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:23-mj-00185

Plaintiff,

VS.

JOSEPH DAVID EMERSON,

Defendant.

UNOPPOSED MOTION TO CONTINUE GRAND JURY REPORT AND ARRAIGNMENT DATE

Comes now Defendant Joseph David Emerson, by and through his attorneys, Noah Horst, Ethan Levi, and Norah Van Dusen, and moves this Court for an Order to Continue the Grand Jury report due date and arraignment date beyond 30 days. The current report due date is December 13, 2024, and the parties would like to continue the due date and arraignment to March 18, 2025.

I have discussed with Mr. Emerson his right to be indicted within 30 days of his arrest under 18 U.S.C. § 3161(b). Mr. Emerson understands his rights and knowingly waives his right to be arraigned within 30 days.

Mr. Emerson is presently out-of-custody.

The Assistant United States Attorney assigned to this matter, Parakram Singh, does not oppose this motion to continue.

**DATED** this 9<sup>th</sup> day of December, 2024.

By: s/Ethan Levi Ethan Levi, OSB No. 994255 Of Attorneys for Defendant